

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

CHRISTINA R. THOMAS,

**CHAPTER** 13

**CASE NO.** 1 - 20 .bk- 00821-HWV

**Debtor(s)**

HARLEY-DAVIDSON CREDIT CORP,

**ADVERSARY NO.**    -    ap-             
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

CHRISTINA R. THOMAS,  
DAVID E. THOMAS, AND  
CHARLES J. DEHART, III, Trustee,

**Nature of Proceeding:** Hearing re:

Motion for Relief from Automatic Stay

**Defendant(s)/Respondent(s)**

**Document #:** 44, 45, 47, 48

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Parties are currently in the process of resolving the Motion for Relief from Stay filed by Harley-Davidson and agree to request a continuance from this Honorable Court of the hearing currently scheduled for Tuesday November 24, 2020.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: November 23, 2020

/s/ Keri P. Ebeck

Attorney for Harley-Davidson Credit Corp.

Name: Keri P. Ebeck, Esq.

Phone Number: (412) 456-8112

<sup>1</sup> No alterations or interlineations of this document are permitted.